

REMARKS

Claim 1 has been amended to further define the invention, and claims 4 and 5 have been canceled. Accordingly, claims 1-3 and 6-15 are pending.

Applicants respectfully assert that support for amended independent claim 1 may be found, for example, in canceled claims 4 and 5 and FIG. 1, as well as corresponding portions of the Specification. Specifically, as shown in FIG. 1, the separation troughs 16 and 21 are provided such that they are recessed within and surrounded by the ring-shaped tanks 15 and 20, respectively. Accordingly, Applicants respectfully assert that amended independent claim 1 does not introduce new matter.

Objections to the Specification

On page 2 of the Final Office Action, use of the word "corresponding" is objected to for allegedly not being disclosed in the Specification. Here, Applicants respectfully assert that use of the word "corresponding" is correctly used and clearly supported by at least FIG. 1, wherein each of the stages 2-4 include a *corresponding* ring-shaped fluid storage tank. Accordingly, Applicants amended the claims to incorporate the usage of the word "corresponding" in order to forgo any perceivable issues under 35 U.S.C. §112. Although the word "corresponding" is not explicitly disclosed in the Specification, Applicants respectfully assert that use of the word "corresponding" is justified as Applicants' claimed invention

recites a plurality of stages, each with its own ring-shaped fluid storage tank.

For at least the reasons set forth above, Applicants respectfully request that the objection to claims 3-9 and 11-15 be withdrawn.

Claim Rejections Under 35 U.S.C. §§102(b) and 103(a)

On pages 2 to 7 of the Final Office Action, claims 1-3 and 11 stand rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Warner et al. (US 3,528,220), and claims 4-10 and 12-15 stand rejected under 35 U.S.C. §102(b) as allegedly being unpatentable over Warner et al. both singularly and in view of Nolan (US 6,399,030). Applicants respectfully traverse these rejections for at least the following reasons.

Independent claim 1, as amended, recites a scrubber for the cleaning of gases including a scrubber tower, a plurality of scrubber stages, and a separation trough leading fluid to a ring-shaped fluid storage tank, wherein the separation trough has "obliquely placed laminae leading the fluid that arrives from one of the plurality of scrubber stages disposed above the separation trough to trough channels arranged under the laminae that lead the fluid onwards to the corresponding ring-shaped fluid storage tank," and "the separation trough is recessed within and surrounded by the ring-shaped fluid storage tank." In direct contrast to Applicants' claimed invention, Warner et al. explicitly discloses, in FIG. 1A, a grid 24 and baffle plate 24a purposely spaced apart and disposed above collecting trays 25

that drain collected scrubbing liquor into respective tanks 28. In addition, Nolan explicitly discloses, col. 3, lines 6-19, the use of a RECYCLE unit 32 disposed at a level below a series of baffles 45 and drain 40 to collect a second reagent within the RECYCLE unit 32. Here, Nolan explicitly requires that the RECYCLE unit 32 be provided at a lowest position of the inclined baffles/drains 45/40 in order to improve drainage into the RECYCLE unit 32.

Accordingly, Applicants respectfully assert that Warner et al. and Nolan, whether taken individually or combined, fail to teach or suggest the relative positioning of a separation trough and a ring-shaped fluid storage tank such that the separation trough has "obliquely placed laminae leading the fluid that arrives from one of the plurality of scrubber stages disposed above the separation trough to trough channels arranged under the laminae to lead the fluid onwards to the corresponding ring-shaped fluid storage tank" and "the separation trough is recessed within and surrounded by the ring-shaped fluid storage tank," as required by at least amended independent claim 1. Thus, Applicants respectfully assert that the combined teachings of Warner et al. and Nolan fail to anticipate, or render *prima facie* obvious, the combination of features recited by at least amended independent claim 1.

For at least the reasons set forth above, Applicants respectfully assert that Warner et al. and Nolan, whether taken singly or combined, fail to teach or suggest the combination of

features recited by at least amended independent claim 1. Thus, Applicants respectfully request that the rejections under 35 U.S.C. §§102(b) and 103(a) be withdrawn.

This Response is believed to be fully responsive and to place the application in condition for allowance. Entry of the Amendment, and an early and favorable action on the merits is earnestly requested. Applicants respectfully request that a timely Notice of Allowance be issued in this application.

Should the Examiner believe that any matters need to be resolved in the present application, the Examiner is respectfully requested to contact Applicants' undersigned representative at the telephone number listed below.

The Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 25-0120 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17.

Respectfully submitted,

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